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Attorneys for LARRY JAMES;  
DAVID R. BATTON; ANDRE DOUZDJIAN;  
BATTON TECHNICAL ENGINEERING  
CONSULTANTS, INC.; BATTON, INC.;  
HANBON -- CARO I, LLC; HANBON --  
MI I, LLC; HANBON MI II, INC.; HANBON --  
MARLETTE, LLC; HANBON -- PA I, LLC;  
TEC GROUP, INC.; DEPLOY HR, INC.;  
DEPLOYHR, INC.

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

CORNERSTONE STAFFING SOLUTIONS, INC.,  
a California Corporation,

Plaintiff,

vs.

LARRY THAXTER JAMES an individual; DAVID  
R. BATTON, an individual; TED MANNELLO, an  
individual; ANDRE DOUZDJIAN, an individual;  
MICHAEL SANTOS, an individual; MARCOS  
BARRERA, an individual; BATTON TECHNICAL  
ENGINEERING CONSULTANTS, INC., a  
Michigan corporation; BATTON DIVERSIFIED  
STAFFING SOLUTIONS, a Michigan corporation;  
HANBON-CARO I, LLC, a Michigan limited  
liability company a/k/a CARO I, LLC; HANBON --  
MI I, LLC, a Michigan limited liability company  
d/b/a TECHNICAL ENGINEERING  
CONSULTANTS; HANBON - MI II, INC., a  
Michigan corporation d/b/a BATTON TECHNICAL  
ENGINEERING CONSULTANTS; HANBON --  
MARLETTE, LLC, a Michigan limited liability  
company; HANBON - PA I, LLC a Pennsylvania  
limited liability company; HANBON - CT I, LLC a

Case No.: 3:12-cv-01527-RS

Assigned to Hon. Richard Seeborg

**STIPULATION TO ADVANCE THE  
DATE FOR THE HEARING ON THE  
NEXT CASE MANAGEMENT  
CONFERENCE AND ~~PROPOSED~~  
ORDER**

Complaint Filed: March 27, 2012

Trial Date: October 28, 2013

1 Connecticut limited liability company; TEC GROUP  
2 INC., a Michigan corporation d/b/a TEC GROUP  
3 ALSO d/b/a TEC-CHRYSLER; DEPLOY HR,  
4 INC., a Pennsylvania corporation d/b/a DEPLOY  
5 HR STAFFING, INC.; DEPLOYHR, INC., a  
6 California corporation d/b/a TEC ALSO d/b/a  
7 BATTON; and DOES 1- 100,

8 Defendants.

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**STIPULATION**

The parties signing below acknowledge the following:

1. The Court recently ordered a continuance of the date for the hearing on Defendants' motions to dismiss CornerStone Staffing Solutions, Inc.'s ("CornerStone") First Amended Complaint ("FAC") in the above-entitled matter from November 15, 2012 to December 13, 2012, at 1:30 p.m. In addition, the Court ordered all parties to appear in person for that hearing.

2. The current date for the next Case Management Conference ("CMC") in this matter is set for December 20, 2012. The CMC was set for that date in order to allow time for the Settlement Conference among the parties to be completed prior to the CMC.

3. The Settlement Conference is scheduled with the Honorable Magistrate Vadas in San Francisco for November 30, 2012.

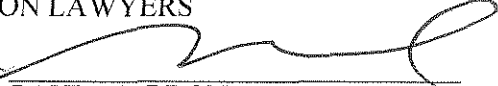
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Based on the foregoing, the parties signing below stipulate and respectfully request the Court to advance the CMC from December 20, 2012, to December 13, 2012, at 1:30 p.m. to consolidate the CMC on the same date as the hearing on the motions to dismiss and avoid another hearing on the following week. Because the Settlement Conference will proceed on November 30, it will be completed well in advance of the December 13 hearing date.

**IT IS SO STIPULATED.**

Dated: 11.8.12      MARRON LAWYERS  
 Signed:   
 PAUL MARRON  
 MARK POLLAND  
 Attorneys for Defendants LARRY JAMES; DAVID R. BATTON; ANDRE DOUZDJIAN; BATTON TECHNICAL ENGINEERING CONSULTANTS, INC.; BATTON, INC.; HANBON -- CARO I, LLC; HANBON -- MI I, LLC; HANBON MI II, INC.; HANBON -- MARLETTE, LLC; HANBON -- PA I, LLC; TEC GROUP, INC.; DEPLOY HR, INC.; DEPLOYHR, INC.

WOODS LAW GROUP  
 Dated: \_\_\_\_\_ Signed: \_\_\_\_\_  
 BRINY WOODS  
 Attorneys for Defendant MICHAEL SANTOS and HANBON -- CT I, LLC

BURKHARDT & LARSON  
 Dated: \_\_\_\_\_ Signed: \_\_\_\_\_  
 PHILIP BURKHARDT  
 Attorneys for Defendant MARCOS BARRERA

HILL, FARRER & BURRILL LLP  
 Dated: \_\_\_\_\_ Signed: \_\_\_\_\_  
 NEIL MARTIN  
 CLAYTON HIX  
 Attorneys for Plaintiff CORNERSTONE STAFFING SOLUTIONS, INC. and Counter-Defendant MARY ANDERSON

Based on the foregoing, the parties signing below stipulate and respectfully request the Court to advance the CMC from December 20, 2012, to December 13, 2012, at 1:30 p.m. to consolidate the CMC on the same date as the hearing on the motions to dismiss and avoid another hearing on the following week. Because the Settlement Conference will proceed on November 30, it will be completed well in advance of the December 13 hearing date.

**IT IS SO STIPULATED.**

**MARRON LAWYERS**

Dated: \_\_\_\_\_

Signed: \_\_\_\_\_

PAUL MARRON  
MARK POLLAND  
Attorneys for Defendants LARRY JAMES; DAVID R. BATTON; ANDRE DOUZDJIAN; BATTON TECHNICAL ENGINEERING CONSULTANTS, INC.; BATTON, INC.; HANBON -- CARO I, LLC; HANBON -- MI I, LLC; HANBON MI II, INC.; HANBON -- MARLETTE, LLC; HANBON -- PA I, LLC; TEC GROUP, INC.; DEPLOY HR, INC.; DEPLOYHR, INC.

**WOODS LAW GROUP**

Dated: 11/8/12

Signed: \_\_\_\_\_

BRINY WOODS  
Attorneys for Defendant MICHAEL SANTOS and HANBON -- CT I, LLC

**BURKHARDT & LARSON**

Dated: \_\_\_\_\_

Signed: \_\_\_\_\_

PHILIP BURKHARDT  
Attorneys for Defendant MARCOS BARRERA

**HILL, FARRER & BURRILL LLP**

Dated: \_\_\_\_\_

Signed: \_\_\_\_\_

NEIL MARTIN  
CLAYTON HIX  
Attorneys for Plaintiff CORNERSTONE STAFFING SOLUTIONS, INC. and Counter-Defendant MARY ANDERSON

Based on the foregoing, the parties signing below stipulate and respectfully request the Court to advance the CMC from December 20, 2012, to December 13, 2012, at 1:30 p.m. to consolidate the CMC on the same date as the hearing on the motions to dismiss and avoid another hearing on the following week. Because the Settlement Conference will proceed on November 30, it will be completed well in advance of the December 13 hearing date.

**IT IS SO STIPULATED.**

**MARRON LAWYERS**

Dated: \_\_\_\_\_

Signed: \_\_\_\_\_

PAUL MARRON  
MARK POLLAND  
Attorneys for Defendants LARRY JAMES; DAVID R. BATTON; ANDRE DOUZDJIAN; BATTON TECHNICAL ENGINEERING CONSULTANTS, INC.; BATTON, INC.; HANBON -- CARO I, LLC; HANBON -- MI I, LLC; HANBON MI II, INC.; HANBON -- MARLETTE, LLC; HANBON -- PA I, LLC; TEC GROUP, INC.; DEPLOY HR, INC.; DEPLOYHR, INC.

**WOODS LAW GROUP**

Dated: \_\_\_\_\_

Signed: \_\_\_\_\_

BRINY WOODS  
Attorneys for Defendant MICHAEL SANTOS and HANBON -- CT I, LLC

**BURKHARDT & LARSON**

Dated: 11/8/12

Signed: \_\_\_\_\_

PHILIP BURKHARDT  
Attorneys for Defendant MARCOS BARRERA

**HILL, FARRER & BURRILL LLP**

Dated: \_\_\_\_\_

Signed: \_\_\_\_\_

NEIL MARTIN  
CLAYTON HIX  
Attorneys for Plaintiff CORNERSTONE STAFFING SOLUTIONS, INC. and Counter-Defendant MARY ANDERSON

Based on the foregoing, the parties signing below stipulate and respectfully request the Court to advance the CMC from December 20, 2012, to December 13, 2012, at 1:30 p.m. to consolidate the CMC on the same date as the hearing on the motions to dismiss and avoid another hearing on the following week. Because the Settlement Conference will proceed on November 30, it will be completed well in advance of the December 13 hearing date.

**IT IS SO STIPULATED.**

**MARRON LAWYERS**

Dated: \_\_\_\_\_

Signed: \_\_\_\_\_

PAUL MARRON  
MARK POLLAND  
Attorneys for Defendants LARRY JAMES; DAVID R. BATTON; ANDRE DOUZDJIAN; BATTON TECHNICAL ENGINEERING CONSULTANTS, INC.; BATTON, INC.; HANBON -- CARO I, LLC; HANBON -- MI I, LLC; HANBON MI II, INC.; HANBON -- MARLETTE, LLC; HANBON -- PA I, LLC; TEC GROUP, INC.; DEPLOY HR, INC.; DEPLOYHR, INC.

**WOODS LAW GROUP**

Dated: \_\_\_\_\_

Signed: \_\_\_\_\_

BRINY WOODS  
Attorneys for Defendant MICHAEL SANTOS and HANBON -- CT I, LLC

**BURKHARDT & LARSON**

Dated: \_\_\_\_\_


Signed: \_\_\_\_\_

PHILIP BURKHARDT  
Attorneys for Defendant MARCOS BARRERA

**HILL, FARRER & BURRILL LLP**

Dated: 11/8/12

Signed: \_\_\_\_\_

  
NEIL MARTIN  
CLAYTON HIX  
Attorneys for Plaintiff CORNERSTONE STAFFING SOLUTIONS, INC. and Counter-Defendant MARY ANDERSON

**[PROPOSED] ORDER**

Pursuant to the foregoing stipulation, the Court orders that the date for the Case Management Conference in the above-entitled matter is advanced from December 20, 2012 to December 13, 2012 at 1:30 p.m. The December 20, 2012 date is vacated.

**IT IS SO ORDERED.**

Date: 11/9/12



The Honorable Richard Seeborg  
Judge of the United States District Court